

**To:** Kowalski, Craig (NFK)[craig.kowalski@MassMail.State.MA.US]  
**From:** Khan, Annie (DPH)  
**Sent:** Fri 4/22/2011 4:13:34 PM  
**Subject:** RE: Predicate questions with answers  
[REDACTED] doc

Welcome. Bad habit of writing in red when I do corrective action on chemist's work for QC/QA.

See attachment for an updated version of the predicate questions: I change the wording of question # 35 and eliminated what was question # 37. I edited these to avoid potential problems from the d/c.

Dan was the confirmatory chemist. His role was to compare the unknown sample to a known standard. We perform confirmatory test because we require reviewable data. I can state that because I am trained in GC/MS (confirmatory test), I can review the documents form my opinion to those findings. It has worked in my previous cases.

We leave that decision up to the ADA, if d/c and the judge has no objections, I can testify to everything. You call the shots. I would suggest to have me testify to everything and see how it goes. But I will still bring Dan just incase. Worst case, he is not needed and I buy him donuts. Haha.

Have a nice weekend as well.

Annie

-----Original Message-----

From: Kowalski, Craig (NFK)  
Sent: Friday, April 22, 2011 9:00 AM  
To: Khan, Annie (DPH)  
Subject: RE: Predicate questions with answers

Annie,

Well! Thank you, thank you, thank you! I wish every witness would do the same and send me back their answers in red.

After reading through that, do I really need Dan? Can you explain to me his role?

Have a great weekend and see you next week. I'll contact you after I get started on Tuesday to confirm the Thursday at 9 time.

Best, Craig

Craig F. Kowalski  
Assistant District Attorney  
Norfolk District Attorney's Office  
45 Shawmut Road  
Canton, MA 02021  
(781) 830-4800, extension 282

The preceding email message (including any attachments) contains information that may be confidential, may be protected by the attorney-client or other applicable privileges, or may constitute non-public information. It is intended to be conveyed only to the designated recipient(s) named above. If you are not an intended recipient of this message, please notify the sender by replying to this message and then delete all copies of it from your computer system. Any use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

-----Original Message-----

From: Khan, Annie (DPH)

Sent: Thursday, April 21, 2011 10:49 PM

To: Kowalski, Craig (NFK)

Subject: Predicate questions with answers

See attachment for the predicate question with my answers.

Avoid questions that deal with: accreditation, publications and external training.

Additional questions that may help build creditability(at least in my experience):

Have you ever testified before?

If so, approximately how many times and which courts?

Hope this helps. Let me know if I need to clarify or expand on any particular topics.

PS: Debi and George knows how to find me.

Annie